

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re:

District Court Case No. 15-53145-MLO
Bankruptcy Court Case No. 17-04596-

MLO

INTEGRATED HEALTH GROUP, P.C.,

Chapter 7

Debtor.

Hon. Maria Oxholm

BASIL SIMON, Trustee for Chapter 7 Debtor
Integrated Health Group, P.C., INTEGRATED
HEALTH CARE SYSTEMS, LLC, INTEGRATED
HCS PRACTICE MANAGEMENT, LLC,
INTEGRATED HCS IMAGING SERVICES
MANAGEMENT, LLC

Plaintiffs,

Vs.

HUSSEIN HURAIBI, NOURA HURAIBI,
SAMEERAH HURAIBI CORTEX, MOHAMED
SALKINI, GEBRE ASHEBIR, MICHAEL J. PENN,
YISROEL SIGLER, SAMI AHMED, FAISAL
AHMED, PARAMOUNT HEALTHCARE
MANAGEMENT, LLC, NA WORLD HOLDINGS,
LLC, HURAIBI ENTERPRISES II, LLC, HURAIBI
PAIN & REHAB INSTITUTE, PLLC, HURAIBI
REHAB INSTITUTE, PLLC, HUSSEIN A.
HURAIBI, M.D., PLLC, ANESTHESIA
CONSULTANTS OF MICHIGAN, PLLC,
KETAMINE INFUSION CENTERS OF
MICHIGAN, PLLC, JOHN DOES 1-17, AND JANE
DOES 1-20,

Defendants.

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AMENDED AFFIRMATIVE DEFENSES

Defendants, Mohamed Salkini and Ahmed Salkini, by and through their attorneys, Thompson Stewart, P.C., and in their Amended Affirmative Defenses, state as follows:

1. Plaintiffs have failed to state a claim upon which relief can be granted and Defendants are entitled to summary disposition as a matter of law.
2. Plaintiffs' claims are barred by the statute of limitations.
3. Plaintiffs' claims are barred by the statute of frauds.
4. To the extent the Plaintiffs' claims are based on equitable grounds, they are barred by the Doctrines of Laches, Waiver, Estoppel and/or Unclean Hands.
5. Plaintiffs have failed to mitigate their damages and Defendants are entitled to set off the amount which would have been saved by Plaintiffs had they reasonably mitigated their damages, if any.
6. To the extent the Plaintiffs may have already served administrative claims with respect to one or more of his causes of action, such claims are barred by the Doctrine of Res Judicata and/or Collateral Estoppel and/or Exhaustion of Remedies.
7. Any injuries or damages suffered by Plaintiffs are, all or in part, the proximate result of Plaintiffs' own acts, failure to act, or statements.
8. Any amounts which Plaintiffs alleges are now due and owing by Defendant are in dispute.
9. Plaintiffs lack standing to pursue claims against Defendants, Mohamed Salkini and Ahmed Salkini.
10. Plaintiffs' claims lack both factual and legal merit.
11. Plaintiffs' claims are barred due to waiver.

12. Plaintiffs' claims are barred by estoppel.
13. Defendants reserve the right to add additional affirmative defenses as they become known through discovery.

Respectfully submitted,

THOMPSON STEWART, P.C.



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Dated: September 25, 2017